

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>V.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p>
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**DECLARATION OF BOBBY G. PRYOR
IN SUPPORT OF PLAINTIFF CHARLENE CARTER’S BILL OF COSTS AND
MOTION FOR ATTORNEYS’ FEES, COSTS, AND EXPENSES FOR MOTION-
FOR-CONTEMPT AND MOTION-TO-COMPEL PROCEEDINGS**

I, Bobby G. Pryor, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm of Pryor & Bruce, and I have served as counsel to Plaintiff Charlene Carter (“Plaintiff”) since May 2022. I have personal knowledge of the matters set forth herein and am competent to give this Declaration.

2. I submit this Declaration in support of Plaintiff Charlene Carter’s Bill of Costs and Motion for Attorneys’ Fees, Costs, and Expenses for Motion-For-Contempt and Motion-to-Compel Proceedings (the “Motion”).

3. Pursuant to Plaintiff’s Bill of Costs and Motion, Plaintiff claims a total of \$56,628.00 in reasonable, non-redundant, and necessary fees for work by Pryor & Bruce attorneys and paralegals, which reflects total fees billed of \$56,628.00 that were related to motion-for-

contempt and motion-to-compel proceedings. In addition, Plaintiff seeks \$140.68 in expenses that Carter incurred through my firm, Pryor & Bruce, in connection with this matter as further set forth in Plaintiff's accompanying Brief. In support of Plaintiff's Motion, I hereby include **Exhibit 1**, which is a true and correct copy of the invoices cataloging the hours Pryor & Bruce attorneys and paralegals expended in connection with this matter. Months where no work was performed on contempt-related issues have been excluded, and one entry unrelated to the contempt proceedings on the August 3, 2023 invoice has been redacted.

4. Pryor & Bruce's invoices include contemporaneous, timekeeper-by-timekeeper entries that provide the amount of time spent on a case-by-case basis, the description of the work done during that time, the timekeeper's rate, and the total amount of fees for that day for that timekeeper. The work Pryor & Bruce performed for Plaintiff is recorded on a tenth-of-an-hour basis.

5. In preparing this fee application, for the Court's convenience, we have compiled the chart attached as **Exhibit 2**, which contains all of the time invoiced on this matter to date. Where tasks that were related to the contempt issues and those that were unrelated to those issues were performed on the same day, hours related to contempt issues are bolded and those unrelated are not, and time is only sought for the time actually spent on the contempt-related issues. Time records on days in which no time was spent on contempt-related issues are not included in the Exhibit 2 chart. Contempt-related hours are included in the column labeled "Time Sought," and a calculation of the fees for such work at Pryor & Bruce's applicable hourly rates is contained in the column labeled "Fees Sought."

6. I and the other Pryor & Bruce timekeepers exercise billing judgment in recording our time to be billed to clients, reducing hours as necessary such that the time recorded represents the value provided. In addition to exercising such judgment, our firm does not charge for travel time. We divide our tasks so that work is done in the most efficient manner possible by assigning tasks to an attorney with a lower billing rate or to a paralegal where possible. In doing so, we ensure that the work we are doing is not duplicative of work performed by another attorney or paralegal.

7. In formulating my opinion that Pryor & Bruce's hours are reasonable, non-redundant, and necessary, I have considered the *Johnson* factors,¹ including, that (a) the time and labor expended by Pryor & Bruce was reasonable and commensurate with the novelty and difficulty of the questions involved, as well as the skill requisite to perform the legal services properly; (b) the fees are reasonable in light of those customarily charged in the locality for similar legal services; (c) the fees are reasonable in light of the amount involved as a result of the controversy and the results obtained; (d) the fees are reasonable in light of the nature and length of the professional relationship between my firm and Plaintiff; and (e) the fees are reasonable in light of the experience, reputation, and ability of the lawyer performing the services on Plaintiff's behalf.

8. All time set forth in **Exhibit 2** for which compensation is claimed was reasonably and necessarily expended on the motion-for-contempt and motion-to-compel proceedings.

9. My hourly rate charged in this matter at the times relevant to this fee request is \$495. I am familiar with the prevailing market rates in the Dallas community, and, from personal

¹ *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

knowledge, my \$495 hourly rate is well below the reasonable hourly rate in the Dallas market for attorneys of my expertise and experience. I am a 1983 *summa cum laude* graduate of the University of Arkansas School of Law and was first licensed in Oklahoma in 1983. I have significant experience litigating employment cases such as this one, and am an experienced trial attorney, having tried over 100 cases. I worked a total of 66.3 hours on the motion-for-contempt and motion-to-compel proceedings for a total of \$32,818.50.

10. Matthew Hill's hourly rate that my firm charges clients and charged in this matter at the times relevant to this fee request is \$395 per hour. Based on my knowledge of the prevailing market rates in the Dallas community, I can attest that Mr. Hill's \$395 hourly rate is well below the reasonable hourly rate in the Dallas market for attorneys of his expertise and experience. Mr. Hill is a 2001 graduate of the University of Chicago Law School, and he was first licensed in 2001. He has significant experience litigating employment cases and has been lead trial attorney in multiple trials. Mr. Hill worked a total of 58.3 hours on the motion-for-contempt and motion-to-compel proceedings for a total of \$23,028.50 in fees.

11. The Pryor & Bruce paralegal who worked in connection with the motion-for-contempt and motion-to-compel proceedings is Cristina Garcia. Ms. Garcia has worked as a legal assistant for twelve years, two years of which she has been a certified paralegal. Ms. Garcia assisted with preparing subpoenas, trial notebooks, and exhibits for the show cause hearings. Ms. Garcia worked 7.1 hours at an hourly rate of \$110 per hour. Plaintiff seeks to recover \$781.00 for Ms. Garcia's time. Based on my knowledge of the prevailing market rates in the Dallas community, I can attest that Ms. Garcia's \$110 hourly rate is well below the reasonable hourly rate in the Dallas market for paralegals of her expertise and experience.

12. In addition to the lawyers from our firm, Matthew Gilliam of the National Right to Work Legal Defense Foundation, Inc. (the “Foundation”) performed work for which the Foundation seeks compensation here. Based on his particular experience and expertise regarding the matters before the Court, it is my firm belief that the \$350 hourly rate set for Mr. Gilliam is reasonable based on those that an attorney with similar experience and background could charge in this district, based upon the customary rates in the Dallas community, which are higher than Mr. Gilliam’s for attorneys with his expertise and experience. Mr. Gilliam is a skilled attorney with significant experience in employment law matters and in dealing with the specific issues in this litigation.

13. For the nature of the motion-for-contempt and motion-to-compel proceedings, each of the three attorneys involved was necessary during the show cause hearings for an effective presentation of evidence to the Court. I prepared for and examined the witnesses. Mr. Hill was necessary to the presentation of trial exhibits (without which I could not have effectively examined the hearing witnesses). Likewise, Mr. Gilliam was indispensable at the hearing given his knowledge of the history of the proceedings, the evidence produced, as well as his expertise on the specific legal issues. In addition, Mr. Gilliam handled the closing arguments. Carter’s team could not have presented her evidence as effectively without the participation of each of these attorneys.

14. In addition, the Foundation paid Pryor & Bruce \$140.68 in expenses expended by Pryor & Bruce on Carter’s behalf in this case.

15. Attached as **Exhibit 3** is an itemized list of the expenses paid by Pryor & Bruce and reimbursed by the Foundation that relate to the motion-for-contempt and motion-to-compel

proceedings. The amounts contained in **Exhibit 3** are accurate and reflect the total amounts expended and reimbursed by the Foundation that are being sought related to these issues.

16. All fees charged by Pryor & Bruce that are sought here except those for work performed in August 2023 have been paid by the Foundation on Carter's behalf.

17. I have reviewed the invoices of Pryor & Bruce in detail relating to these fees and costs and have determined that the time expended is reasonable, non-redundant, and necessary, given the nature of this matter, and the prevailing rates in this market.

I swear under penalty of perjury that the foregoing is true and correct.

DATED: August 21, 2023

/S/ BOBBY G. PRYOR

Bobby G. Pryor

EXHIBIT 1

PRYOR & BRUCE

Attorneys at Law

302 N. San Jacinto
Rockwall, Texas 75087

Telephone (972) 771-3933

Fax (972) 771-8343

E-mail dbruce@pryorandbruce.comwww.pryorandbruce.com

January 3, 2023

Invoice: 006

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
12/14	Review emails and comment on bond amount	DGB	NC (.40)
12/19	Review and revise motions re fees and costs; emails and confs re the same; review exhibits to the same; review declaration and exhibits re the same	BGP	3.20
12/20	Review documents re SW's purported compliance w/court order; emails re the same; review letter re corrected filing; emails re the same; review file re preparation of letter to opposing counsel re noncompliance w/court order; draft letter re the same; emails re the same	BGP	1.80
12/20	Review Southwest email and legal review; conf. w/B. Pryor re strategy and sanctions	DGB	NC (.70)
12/20	Prepare draft letter to court re invoice error; email B. Pryor re same; email M. Gilliam re same	MDH	NC (.50)
12/20	Review authorities re calculation of post-judgment interest for inclusion in supersedeas bond; calculate interest rate; email M. Gilliam re interest calculation; review and comment on proposed email to P. McKeeby re supersedeas bond; evaluate email and notice sent by Southwest to flight attendants; email M. Gilliam and B. Pryor re same	MDH	1.20
12/21	Comments re notice to OPC re violations of injunction	DGB	NC (.30)
12/22	Review revised draft letter to opposing counsel re noncompliance w/court order; emails re the same	BGP	.10

DATE	DESCRIPTION	ATTY	TIME
12/27	Review and comment on draft motion re SW failure to comply w/court order; emails and calls re the same	BGP	.40
12/27	Email M. Gilliam re Southwest's requested extension of time to respond to contempt issue; review and comment on motion for contempt	MDH	1.50
12/28	Review SW response to noncompliance issue; emails re strategy for proceeding; emails re addressing SW position letter in motion	BGP	.30
12/28	Review Southwest's motion for stay and supersedeas bond; calculate total amounts to be included in bond; detailed email to P. McKeeby re same; review email from P. McKeeby re compliance with court's judgment; email B. Pryor re response to same; conf. w/ M. Gilliam re same	MDH	1.90
12/29	Review and revise latest draft of motion re noncompliance; prepare email re additional comments to motion; emails re the same	BGP	.60
12/29	Review and comment on proposed order and declaration of C. Carter for sanctions motion; email paralegal re upcoming deadlines to docket; review and comment on revised declaration; review and comment on proposed addition to motion; review and comment on revised motion	MDH	1.20
12/30	Review SW proposed order re supersedeas bond; emails re need to correct the same	BGP	.10
12/30	Review and comment on updated motion for sanctions and proposed order; email M. Gilliam re C. Carter declaration; review proposed order from Southwest re supersedeas bond; email M. Gilliam re problems w/ same; email P. McKeeby re same; email M. Gilliam re conference requirement on motion for new trial; email exchange w/ M. Gilliam re proposed emails to Local 556 re supersedeas bond inquiry; conf. w/ M. Gilliam re same	MDH	2.40

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	6.50	\$495.00	\$3,217.50
DGB	NC – 1.40	\$495.00	\$0 (\$693.00 NC)
MDH	8.20 (.50 NC)	\$395.00	\$3,239.00 (\$197.50 NC)
Paralegal	NA	\$160.00	\$0
Paralegal 2	NA	\$110.00	\$0
Total Attorney/Paralegal Fees:			\$6,456.50

EXPENSES:

Description	Qty.	Amt.	Total
Copies	11	.15	\$1.65
Total Expenses:			\$1.65

PAST DUE (DEC. 20, 2022): \$12,926.15

DUE THIS INVOICE: \$ 6,458.15

TOTAL DUE: \$19,384.30

* Pryor & Bruce will increase its rates by five percent beginning January 1, 2023. We believe Pryor & Bruce's rates continue to be a reasonable value and well below market for attorneys with comparable experience and skill.

PRYOR & BRUCE

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February 7, 2023

Invoice: 007

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
1/3	Review SW motion for new trial; emails re the same; review cost award; emails re Local 556 bond issues	BGP	.50
1/3	Email M. Gilliam re taxation of costs effect and timeline; calculate amounts for inclusion in supersedeas bond; email M. Gilliam re same and comments on union's request for supersedeas bond; email M. Gilliam re response to E. Cloutman re supersedeas bond; review and comment on supersedeas bond sent by union	MDH	1.50
1/4	Emails re Local 556 bond issues; conf w/M. Hill re the same; review Local 556 motion to stay; review Local 556 notice of appeal; review joint supersedeas bond	BGP	.20
1/6	Initial review of SW response to sanction motion; emails re the same	BGP	.20
1/6	Review motion to stay filed by union and Southwest; email M. Gilliam re bond amount included in motion; review Southwest's response to motion for contempt	MDH	.40
1/7	Initial review of SW response to motion for attorney's fees; emails re the same; initial review of Local 556 response to motion for attorney's fees	BGP	.30
1/8	Teleconf w/M. Hill re SW and Local 556 response to motion for attorney's fees; email to M. Gilliam re the same	BGP	.20
1/9	Review and comment on draft reply re motion for sanctions; emails re the same	BGP	.30

DATE	DESCRIPTION	ATTY	TIME
1/9	Review Southwest's response to motion for fees	MDH	.30
1/10	Email paralegal re deadlines for filings; begin review and revision of reply on motion for sanctions; email M. Gilliam re same	MDH	1.60
1/11	Finish review and revision of reply on motion for sanctions; additional comments on revised draft of same; review and comment on final version of same	MDH	.70
1/13	Review letter from 5th Circuit Court of Appeals re deadlines and procedures; emails re the same	BGP	.20
1/17	Teleconf. w/M. Gilliam re appeal issues; review motion to hold in abeyance and emails re same	BGP	.20
1/19	Draft entry of appearance for B. Pryor and M. Hill; email M. Hill re same; register B. Pryor for ECF for the 5th Circuit	PL2	NC (.70)
1/20	Begin review and comment on response to Southwest's motion for new trial and judgment NOV	MDH	2.10
1/20	Revise entry of appearance for B. Pryor and M. Hill; email B. Pryor and M. Hill re same; file entry of appearance for B. Pryor	PL2	NC (.40)
1/21	Continue work on revision of on response to Southwest's motion for new trial and judgment NOV	MDH	3.20
1/22	Review and comment on draft response to motion for new trial; emails re the same; review and comment on reply re motion for attorneys' fees; emails re the same	BGP	.80
1/22	Additional review and revision of on response to Southwest's motion for new trial and judgment NOV; review and comment on reply to Southwest's response re attorney's fees; email M. Gilliam re jury instructions argument; email M. Gilliam re reply to Southwest's response on attorney's fees; conf. w/ M. Gilliam re motion for new trial and judgment NOV; additional emails to M. Gilliam re additional points re motion for new trial; review and comment on reply to union's response on attorney's fees; review and comment on response and proposed order re motion for new trial	MDH	8.10
1/23	Review reply re attorneys' fees and response to motion for new trial; emails re the same	BGP	.20
1/23	Review and comment on updated response to motion for new trial; research to add additional cases in support of same; follow-up email to M. Gilliam on mitigation issue; final review and comment on revised response to motion for new trial	MDH	5.20
1/25	Conf. w/ M. Gilliam re strategy for addressing exhibits filed by union	MDH	.40

DATE	DESCRIPTION	ATTY	TIME
1/26	Email exchange w/ M. Gilliam re strategy on addressing confidential information in exhibit filed by union	MDH	.20
1/27	Email exchange w/ M. Gilliam re issue with confidential information in exhibit	MDH	.20
1/30	Email M. Gilliam re information requested by A. Greenfield	MDH	.10

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	3.10	\$495.00	\$1,534.50
DGB	NA	\$495.00	\$0
MDH	24.00	\$395.00	\$9,480.00
Paralegal	NA	\$160.00	\$0
Paralegal 2	(1.10 NC)	\$110.00	(\$121.00 NC)
Total Attorney/Paralegal Fees:			\$11,014.50

EXPENSES:

Description	Qty.	Amt.	Total
Pacer			\$3.00
Total Expenses:			\$3.00

DUE THIS INVOICE: \$11,017.50

PRYOR & BRUCE

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May 1, 2023

Invoice: 009

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
4/10	Review Order re Discovery Show Cause Hearing	BGP	.10
4/11	Teleconf. w/M. Gilliam re show cause hearing issues	BGP	NC (.20)
4/12	Conf. w/B. Pryor re strategy on hearing subpoenas and executives in chain of approval process	DGB	NC (.50)
4/24	Review Order Denying Defendants' Motion for New Trial; emails re the same	BGP	.20
4/24	Review court's order re defendants' motion for new trial	MDH	.40
4/28	Review documents and privilege log produced by Southwest; emails re the same	BGP	.30
4/28	Analysis of documents and privilege log provided by Southwest re sanctions issue; email M. Gilliam re strategy points re same	MDH	.40

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	.60 (.20 NC)	\$495.00	\$297.00 (\$99.00 NC)
DGB	NA (.50 NC)	\$495.00	\$0 (\$247.50 NC)
MDH	.80	\$395.00	\$316.00
Paralegal	NA	\$160.00	\$0
Paralegal 2	NA	\$110.00	\$0
Total Attorney/Paralegal Fees:			\$613.00

EXPENSES:

NA

DUE THIS INVOICE: \$613.00

PRYOR & BRUCE

Attorneys at Law

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June 9, 2023

Invoice: 010

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
5/1	Review privilege log and Judge's show cause order re preparation for call; teleconf w/M. Hill and M. Gilliam re status and strategy	BGP	.70
5/1	Conf. w/ M. Gilliam and B. Pryor re documents produced by Southwest and strategy for addressing same; review and comment on items to address with Southwest re documents provided	MDH	1.20
5/2	Review M. Hill notes re teleconf w/opposing counsel and emails re the same; teleconf w/M. Hill re comments on email to opposing counsel re privilege log issues	BGP	NC (.30)
5/2	Conf. w/ P. McKeeby, B. Morris, and M. Gilliam re document production issues; confs. w/ M. Gilliam re strategy re same; review and comment on draft email to P. McKeeby re same	MDH	1.40
5/3	Review emails w/opposing counsel re privilege log issues	BGP	NC (.10)
5/3	Email M. Gilliam re inquiry on extension of time for brief from P. McKeeby	MDH	.10
5/4	Review draft motion re show cause hearing; review documents re the same; teleconf w/M. Hill re the same; review revised privilege log; emails re the same	BGP	.80
5/4	Review and comment on prehearing brief re show cause order, including adding section re criminal contempt; conf.	MDH	4.20

DATE	DESCRIPTION	ATTY	TIME
	w/ B. Pryor re same; conf. w/ M. Gilliam re same; follow-up conf. w/ M. Gilliam re brief		
5/5	Review proposed order and exhibits redactions	BGP	NC (.20)
5/5	Review and comment on proposed order; instruct paralegal re redaction of personal information on appendix to brief; conf. w/ M. Gilliam re strategy on brief; email M. Gilliam re redacted appendix; additional review and comment on revised brief; email exchange w/ M. Gilliam re same	MDH	1.70
5/5	Redact exhibits; email M. Hill re same	PL2	.60
5/8	Review Judge's order re motion to compel; draft email to M. Gilliam and M. Hill re strategy for proceeding; review draft emails to opposing counsel re the same; review and comments on follow-up emails re the same	BGP	1.20
5/8	Review and comment on proposed emails to P. McKeeby and union re appearing at hearing and subpoenas; review and comment on proposed subpoenas; conf. w/ M. Gilliam re witness issues for hearing; review and comment on proposed email to union re subpoenas; email M. Gilliam re witness attendance issue and subpoenas	MDH	1.10
5/9	Review and comment on emails re subpoena issues; teleconf w/M. Gilliam re status and strategy; review and revise draft motion re subpoenas; review Southwest response to Motion to Compel; teleconf w/M. Gilliam re the same	BGP	1.60
5/9	Review and comment on proposed email to P. McKeeby re witness issues; review motion to compel witnesses; email B. Pryor re thoughts on same; email M. Gilliam re same	MDH	.50
5/10	Emails re motion to compel attendance	BGP	.10
5/10	Review and comment on motion regarding witnesses and proposed order	MDH	1.20
5/12	Review and comment on brief filed by Southwest re show cause hearing	MDH	.30
5/14	Review SW brief re Court order; review file re the same; review authorities re the same; review Court's order to determine propriety of response; emails and confs re SW brief; emails and teleconfs w/M. Gilliam re status, strategy, show cause hearing and responding to SW brief; drafting comments for motion for leave to file response to SW brief re Court order; draft comments for substantive response to SW brief re Court order; review file re the same; teleconfs w/M. Gilliam re the same; additional review and revision of motion for leave; emails re the same	BGP	7.20

DATE	DESCRIPTION	ATTY	TIME
5/14	Comment on proposed email to P. McKeeby re conference on leave to file response brief; follow-up email on strategy re same	MDH	.20
5/15	Final comments to motion for leave; emails w/M. Gilliam re the same; review and revise draft substantive response to SW brief re Court order; emails and teleconfs re the same	BGP	2.40
5/15	Review and comment on response brief re show cause hearing	MDH	.50
5/16	Review file re identifying potential exhibits for show cause hearing; emails re the same; emails re witnesses for show cause hearings; review and comment on emails re subpoena issues; review Court's order re in camera documents; review Judge's order re witnesses; emails and confs re the same; confs w/D. Bruce re status and strategy	BGP	3.50
5/16	Review Court orders and teleconf. w/B. Pryor re strategy	DGB	NC (.80)
5/16	Review and comment on proposed email to P. McKeeby and A. Ryan re subpoenas for show cause hearing; confs. w/ M. Gilliam re witness issues; email M. Gilliam re witness issues; review and comment on proposed email to union re witness issues; email M. Gilliam re process server timing; review and sign subpoenas; email M. Gilliam update re service of subpoenas; email M. Gilliam re service of B. Morris timing; email M. Gilliam re proposed email to union; conf. w/ B. Pryor and M. Gilliam re court's order re religious liberty training; email process server re cancellation of service	MDH	1.80
5/16	Email process server re quote for subpoenas; conf. w/ M. Hill re same; revise subpoena re same; email M. Hill re same; assemble same; email process server re same	PL2	1.70
5/17	Emails re opposing counsel request to file trial brief; teleconf w/M. Gilliam and M. Hill re show cause hearing and strategy for the same; conf w/D. Bruce re show cause hearing issues	BGP	1.80
5/17	Conf. w/B. Pryor re upcoming hearing, privilege issues, invoking rule, and potential claims and damages of Charlene Carter	DGB	NC (.80)
5/17	Email M. Gilliam re P. McKeeby's inquiry re leave to file brief; conf. w/ B. Pryor and M. Gilliam re sanctions hearing strategy; comment on proposed email to union re setting up call	MDH	.90
5/18	Review SW motion for leave to file trial brief; review SW brief re witness issues; review SW in camera document production; emails re the same; review Order re the same; confs w/D. Bruce re strategy for show cause hearing	BGP	1.00

DATE	DESCRIPTION	ATTY	TIME
	including exhibits to use, witnesses to call and order of witnesses		
5/18	Review briefs and conf. w/B. Pryor re strategy for hearing	DGB	NC (.40)
5/18	Identify and email paralegal re documents to be included in hearing notebook; conf. w/ M. Gilliam in preparation for call w/ union; conf. call w/ E. Cloutman and A. Greenfield re communications w/ Southwest about notices; follow-up call w/ M. Gilliam re same; conf. w/ M. Gilliam re Southwest's brief in response to court order; email exchange w/ B. Pryor re same; review documents produced by Southwest after in camera inspection; email M. Gilliam re same	MDH	1.90
5/18	Assemble hearing notebook for B. Pryor; email M. Hill re same	PL2	1.10
5/19	Review and revise brief in response to SW brief re Court order; emails re same	BGP	.40
5/19	Review and comment on response brief re show cause hearing; email B. Pryor re court's order re witnesses; review Southwest's response re religious liberty training	MDH	1.70
5/21	Conf. w/B. Pryor re witness examination strategy	MDH	.10
5/22	Review communications produced by union; conf. w/ M. Gilliam re same; email B. Pryor re same; email documents to paralegal for inclusion in hearing notebook; review cases re Southwest's argument on ultimate employment actions; conf. w/ M. Gilliam re arguments responding to Southwest's brief; review and comment on brief re religious liberty training; confs. w/ M. Gilliam re brief; prepare presentation of documents to be used at hearing	MDH	5.10
5/22	Assemble hearing notebook for B. Pryor; email M. Hill re same	PL2	1.10
5/23	Finalize preparation for show cause hearing including preparation of examination of all witnesses and review documents re the same; show cause hearing; confs w/client and M. Gilliam	BGP	7.80
5/23	Travel to courthouse	BGP	NC (.70)
5/23	Additional preparation of document presentation for hearing; conf. w/ M. Gilliam in preparation for hearing; conf. w/ B. Pryor in preparation for hearing; attend show cause hearing	MDH	6.70
5/23	Travel to and from show cause hearing	MDH	NC (1.10)
5/24	Emails re scheduling issues, order of witnesses and witness examination issues; teleconf w/M. Gilliam re the same; conf w/D. Bruce re show cause issues; prepare email	BGP	1.70

DATE	DESCRIPTION	ATTY	TIME
	memorandum to M. Gilliam re show cause issues; review file re the same		
5/24	Conf. w/B. Pryor re strategy re continuation of hearing and further cross-examination of witnesses and arguments re violations by Southwest of Court's orders	DGB	NC (1.40)
5/25	Teleconf. w/M. Gilliam re status, strategy and issues re motion for sanctions; conf w/D. Bruce re results of show cause hearing and issues to raise in closing and subsequent hearing	BGP	.70
5/25	Conf. w/B. Pryor re strategy re closing statement and evidence and points of emphasis; email w/B. Pryor re closing and additional points	DGB	NC (.60)
5/30	Conf. w/ B. Pryor re strategy responding to A. Ryan re logistical issues; email M. Gilliam re same; conf. w/ M. Gilliam re same	MDH	.30
5/30	Email M. Hill re entry of appearances cause number	PL2	NC (.10)

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	30.90 (1.30 NC)	\$495.00	\$15,295.50 (\$643.50 NC)
DGB	(4.00 NC)	\$495.00	(\$1,980.00 NC)
MDH	30.90 (1.10 NC)	\$395.00	\$12,205.50 (\$434.50 NC)
Paralegal	NA	\$160.00	\$0
Paralegal 2	4.50 (.10 NC)	\$110.00	\$495.00 (\$11.00 NC)
Total Attorney/Paralegal Fees:			\$27,996.00

EXPENSES:

Description	Qty.	Amt.	Total
Parking			\$40.00
Pacer			\$7.50
Litigation Express			\$40.00
Mileage	21	.29	\$6.09
TOTAL DUE:			\$93.59

DUE THIS INVOICE: \$28,089.59

PRYOR & BRUCE

Attorneys at Law

302 N. San Jacinto
Rockwall, Texas 75087

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Telephone (972) 771-3933
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www.pryorandbruce.com

July 6, 2023

Invoice: 011

VIA ELECTRONIC TRANSMISSION

Charlene Carter
c/o National Right to Work Legal Defense Foundation, Inc.
8001 Braddock Road, Suite 600
Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
6/2	Review motion to consolidate; emails re the same	BGP	NC (.20)
6/2	Email M. Gilliam re new judge-specific requirement re A.I.	MDH	.20
6/4	Email paralegal re filing certificates of compliance; review transcript to confirm P. McKeeby exclusion under the Rule; email M. Gilliam and B. Pryor re same	MDH	.40
6/5	Emails and calls re re-scheduling show cause hearing and time limit proposals	BGP	.10
6/5	Revise certificate re judge's requirements; email B. Pryor and M. Hill re same; file same	PL2	NC (.20)
6/6	Emails re show cause hearing	BGP	.10
6/6	Email M. Gilliam re hearing scheduling	MDH	.10
6/7	Emails re consolidation of appeals	BGP	NC (.10)
6/9	Approve notices of appearance re counsel	BGP	NC (.10)
6/9	Revise invoice; email D. Bruce and B. Pryor re same; draft notice of appearance forms for B. Pryor and M. Hill re same; conf. w/ M. Hill re same; file same	PL2	NC (.60)

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	.20 (.40 NC)	\$495.00	\$99.00 (\$198.00 NC)
DGB	NA	\$495.00	\$0
MDH	.70	\$395.00	\$276.50
Paralegal	NA	\$160.00	\$0
Paralegal 2	(.80 NC)	\$110.00	(\$88.00 NC)
Total Attorney/Paralegal Fees:			\$375.50

EXPENSES:

Description	Qty.	Amt.	Total
Pacer			\$0.40
TOTAL DUE:			\$0.40

DUE THIS INVOICE: \$375.90

PRYOR & BRUCE

Attorneys at Law

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Rockwall, Texas 75087—
Telephone (972) 771-3933
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E-mail dbruce@pryorandbruce.com
www.pryorandbruce.com

August 3, 2023

Invoice: 012

VIA ELECTRONIC TRANSMISSIONCharlene Carter
c/o National Right to Work Legal Defense Foundation, Inc.
8001 Braddock Road, Suite 600
Springfield, Virginia 22160Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
7/3	Email M. Gilliam re inquiry from A. Ryan re exhibits	MDH	.10
7/6	Call and emails to A. Ryan re conference on exhibits	MDH	.10
7/7	Conf. w/M. Gilliam and A. Ryan re exhibit issues	MDH	.20
7/10	Review emails and information received from [REDACTED] email to M. Gilliam re the same	BGP	.20
7/10	Review exhibits sent by K. Frye to confirm completeness and accuracy; email M. Gilliam and B. Pryor re same; email paralegal re redacting Exhibit 16	MDH	.50
7/11	Email A. Ryan re redacted Exhibit 16; email M. Gilliam re C. Carter's attendance at hearing	MDH	.20
7/11	Review and redact exhibit 16	PL2	.10
7/13	Email paralegal re preparing hearing exhibits	MDH	.10
7/14	Review prior hearing transcript; outline the same; review prior hearing exhibits; emails re the same; review documents re request for documents to union counsel; emails re the same; review index of show cause hearing documents; emails re the same; teleconf. w/M. Gilliam re status and strategy	BGP	4.00
7/14	Conf. w/ M. Gilliam and B. Pryor re hearing strategy; email paralegal re documents to use at hearing	MDH	1.10
7/14	Continue assembling additional exhibits for show cause hearing	PL2	.60

DATE	DESCRIPTION	ATTY	TIME
7/17	Review SWA Ex 1 and outline issues; emails re the same; review SWA Ex. 2 and outline the same; emails re the same; emails re trial exhibit 10; prepare for show cause hearing and review documents re the same	BGP	4.30
7/17	Strategy re cross-examination and failure to produce document and redo entire production	DGB	NC (.40)
7/17	Locate and email B. Pryor re former Southwest accommodation policy	MDH	.20
7/18	Review documents re preparation for examination of P. McKeeby; outline examination re the same; review pleading and prior motion practice and briefing related to show cause issues	BGP	6.10
7/18	Strategy conf. w/B. Pryor re examination of witnesses	DGB	NC (.50)
7/18	Email B. Pryor re witness for hearing	MDH	.20
7/19	Review documents re K. Minchey examination; outline examination of K. Minchey; review documents re K. Forbes examination; outline K. Forbes examination; review documents relating to emails not produced by SW; emails re the same; confs re the same; prepare for show cause hearing; teleconf w/M. Gilliam re status and strategy	BGP	8.20
7/19	Continue assembling additional exhibits for show cause hearing	PL2	1.70
7/19	Conf. w/ B. Pryor re documents to use in examinations at hearing; prepare presentation for show-cause hearing	MDH	4.80
7/20	Finalize preparation for show cause hearing; show cause hearing	BGP	6.80
7/20	Final work to prepare presentation for hearing; attend show-cause hearing; email K. Frye re additional exhibits used at hearing	MDH	8.10
7/20	Conf. w/ M. Hill re exhibits; mark exhibits 17 and 18; email M. Hill re same	PL2	.20

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	29.60	\$495.00	\$14,652.00
DGB	NA (.90 NC)	\$495.00	\$0 (\$445.50 NC)
MDH	15.60	\$395.00	\$6,162.00
Paralegal	NA	\$160.00	\$0
Paralegal 2	2.60	\$110.00	\$286.00
Total Attorney/Paralegal Fees:			\$21,100.00

EXPENSES:

Description	Qty.	Amt.	Total
Mileage	21	.29	\$6.09
Parking			\$38.00
TOTAL DUE:			\$44.09

DUE THIS INVOICE: \$21,144.09

EXHIBIT 2

Date	User	Description	Actual Time	Time Sought	Rate	Amount Sought
12/20/2022	Pryor, Bobby G.	Review documents re SW's purported compliance w/court order; emails re the same; review letter re corrected filing; emails re the same; review file re preparation of letter to opposing counsel re noncompliance w/court order; draft letter re the same; emails re the same	1.8	1.4	\$495.00	\$693.00
12/20/2022	Bruce, Dana G.	Review Southwest email and legal review; conf. w/B. Pryor re strategy and sanctions	NC (.70)	0	\$495.00	\$0.00
12/20/2022	Hill, Matthew D.	Review authorities re calculation of post-judgment interest for inclusion in supersedeas bond; calculate interest rate; email M. Gilliam re interest calculation; review and comment on proposed email to P. McKeeby re supersedeas bond; evaluate email and notice sent by Southwest to flight attendants; email M. Gilliam and B. Pryor re same	1.2	0.3	\$395.00	\$118.50
12/27/2022	Pryor, Bobby G.	Review and comment on draft motion re SW failure to comply w/court order; emails and calls re the same	0.4	0.4	\$495.00	\$198.00
12/27/2022	Hill, Matthew D.	Email M. Gilliam re Southwest's requested extension of time to respond to contempt issue; review and comment on motion for contempt	1.5	1.5	\$395.00	\$592.50
12/28/2022	Pryor, Bobby G.	Review SW response to noncompliance issue; emails re strategy for proceeding; emails re addressing SW position letter in motion	0.3	0.3	\$495.00	\$148.50
12/28/2022	Hill, Matthew D.	Review Southwest's motion for stay and supersedeas bond; calculate total amounts to be included in bond; detailed email to P. McKeeby re same; review email from P. McKeeby re compliance with court's judgment; email B. Pryor re response to same; conf. w/ M. Gilliam re same	1.9	0.8	\$395.00	\$316.00
12/29/2022	Pryor, Bobby G.	Review and revise latest draft of motion re noncompliance; prepare email re additional comments to motion; emails re the same	0.6	0.6	\$495.00	\$297.00
12/29/2022	Hill, Matthew D.	Review and comment on proposed order and declaration of C. Carter for sanctions motion; email paralegal re upcoming deadlines to docket; review and comment on revised declaration; review and comment on proposed addition to motion; review and comment on revised motion	1.2	1.2	\$395.00	\$474.00
12/30/2022	Hill, Matthew D.	Review and comment on updated motion for sanctions and proposed order; email M. Gilliam re C. Carter declaration; review proposed order from Southwest re supersedeas bond; email M. Gilliam re problems w/ same; email P. McKeeby re same; email M. Gilliam re conference requirement on motion for new trial; email exchange w/ M. Gilliam re proposed emails to Local 556 re supersedeas bond inquiry; conf. w/ M. Gilliam re same	2.4	0.9	\$395.00	\$355.50
01/06/2023	Pryor, Bobby G.	Initial review of SW response to sanction motion; emails re the same	0.2	0.2	\$495.00	\$99.00
01/09/2023	Pryor, Bobby G.	Review and comment on draft reply re motion for sanctions; emails re the same	0.3	0.3	\$495.00	\$148.50
01/11/2023	Hill, Matthew D.	Finish review and revision of reply on motion for sanctions; additional comments on revised draft of same; review and comment on final version of same	0.7	0.7	\$395.00	\$276.50
04/10/2023	Pryor, Bobby G.	Review Order re Discovery Show Cause Hearing	0.1	0.1	\$495.00	\$49.50
04/28/2023	Pryor, Bobby G.	Review documents and privilege log produced by Southwest; emails re the same	0.3	0.3	\$495.00	\$148.50
04/28/2023	Hill, Matthew D.	Analysis of documents and privilege log provided by Southwest re sanctions issue; email M. Gilliam re strategy points re same	0.4	0.4	\$395.00	\$158.00
05/01/2023	Pryor, Bobby G.	Review privilege log and Judge's show cause order re preparation for call; teleconf w/M. Hill and M. Gilliam re status and strategy	0.7	0.7	\$495.00	\$346.50
05/01/2023	Hill, Matthew D.	Conf. w/ M. Gilliam and B. Pryor re documents produced by Southwest and strategy for addressing same; review and comment on items to address with Southwest re documents provided	1.2	1.2	\$395.00	\$474.00
05/02/2023	Pryor, Bobby G.	Review M. Hill notes re teleconf w/opposing counsel and emails re the same; teleconf w/M. Hill re comments on email to opposing counsel re privilege log issues	NC (.30)	0	\$495.00	\$0.00
05/02/2023	Hill, Matthew D.	Conf. w/ P. McKeeby, B. Morris, and M. Gilliam re document production issues; confs. w/ M. Gilliam re strategy re same; review and comment on draft email to P. McKeeby re same	1.4	1.4	\$395.00	\$553.00
05/03/2023	Pryor, Bobby G.	Review emails w/opposing counsel re privilege log issues	NC (.10)	0	\$495.00	\$0.00
05/03/2023	Hill, Matthew D.	Email M. Gilliam re inquiry on extension of time for brief from P. McKeeby	0.1	0.1	\$395.00	\$39.50
05/04/2023	Pryor, Bobby G.	Review draft motion re show cause hearing; review documents re the same; teleconf w/M. Hill re the same; review revised privilege log; emails re the same	0.8	0.8	\$495.00	\$396.00
05/04/2023	Hill, Matthew D.	Review and comment on prehearing brief re show cause order, including adding section re criminal contempt; conf. w/ B. Pryor re same; conf. w/ M. Gilliam re same; follow-up conf. w/ M. Gilliam re brief	4.2	4.2	\$395.00	\$1,659.00
05/05/2023	Pryor, Bobby G.	Review proposed order and exhibits redactions	NC (.20)	0	\$495.00	\$0.00
05/05/2023	Hill, Matthew D.	Review and comment on proposed order; instruct paralegal re redaction of personal information on appendix to brief; conf. w/ M. Gilliam re strategy on brief; email M. Gilliam re redacted appendix; additional review and comment on revised brief; email exchange w/ M. Gilliam re same	1.7	1.7	\$395.00	\$671.50
05/05/2023	Garcia, Cristina	Redact exhibits; email M. Hill re same	0.6	0.6	\$110.00	\$66.00
05/08/2023	Pryor, Bobby G.	Review Judge's order re motion to compel; draft email to M. Gilliam and M. Hill re strategy for proceeding; review draft emails to opposing counsel re the same; review and comments on follow-up emails re the same	1.2	1.2	\$495.00	\$594.00

05/08/2023	Hill, Matthew D.	Review and comment on proposed emails to P. McKeeby and union re appearing at hearing and subpoenas; review and comment on proposed subpoenas; conf. w/ M. Gilliam re witness issues for hearing; review and comment on proposed email to union re subpoenas; email M. Gilliam re witness attendance issue and subpoenas	1.1	1.1	\$395.00	\$434.50
05/09/2023	Pryor, Bobby G.	Review and comment on emails re subpoena issues; teleconf w/M. Gilliam re status and strategy; review and revise draft motion re subpoenas; review Southwest response to Motion to Compel; teleconf w/M. Gilliam re the same	1.6	1.6	\$495.00	\$792.00
05/09/2023	Hill, Matthew D.	Review and comment on proposed email to P. McKeeby re witness issues; review motion to compel witnesses; email B. Pryor re thoughts on same; email M. Gilliam re same	0.5	0.5	\$395.00	\$197.50
05/10/2023	Pryor, Bobby G.	Emails re motion to compel attendance	0.1	0.1	\$495.00	\$49.50
05/10/2023	Hill, Matthew D.	Review and comment on motion regarding witnesses and proposed order	1.2	1.2	\$395.00	\$474.00
05/12/2023	Hill, Matthew D.	Review and comment on brief filed by Southwest re show cause hearing	0.3	0.3	\$395.00	\$118.50
05/14/2023	Pryor, Bobby G.	Review SW brief re Court order; review file re the same; review authorities re the same; review Court's order to determine propriety of response; emails and confs re SW brief; emails and teleconfs w/M. Gilliam re status, strategy, show cause hearing and responding to SW brief; drafting comments for motion for leave to file response to SW brief re Court order; draft comments for substantive response to SW brief re Court order; review file re the same; teleconfs w/M. Gilliam re the same; additional review and revision of motion for leave; emails re the same	7.2	7.2	\$495.00	\$3,564.00
05/14/2023	Hill, Matthew D.	Comment on proposed email to P. McKeeby re conference on leave to file response brief; follow-up email on strategy re same	0.2	0.2	\$395.00	\$79.00
05/15/2023	Pryor, Bobby G.	Final comments to motion for leave; emails w/M. Gilliam re the same; review and revise draft substantive response to SW brief re Court order; emails and teleconfs re the same	2.4	2.4	\$495.00	\$1,188.00
05/15/2023	Hill, Matthew D.	Review and comment on response brief re show cause hearing	0.5	0.5	\$395.00	\$197.50
05/16/2023	Pryor, Bobby G.	Review file re identifying potential exhibits for show cause hearing; emails re the same; emails re witnesses for show cause hearings; review and comment on emails re subpoena issues; review Court's order re in camera documents; review Judge's order re witnesses; emails and confs re the same; confs w/D. Bruce re status and strategy	3.5	3.5	\$495.00	\$1,732.50
05/16/2023	Bruce, Dana G.	Review Court orders and teleconf. w/B. Pryor re strategy	NC (.80)	0	\$495.00	\$0.00
05/16/2023	Hill, Matthew D.	Review and comment on proposed email to P. McKeeby and A. Ryan re subpoenas for show cause hearing; confs. w/ M. Gilliam re witness issues; email M. Gilliam re witness issues; review and comment on proposed email to union re witness issues; email M. Gilliam re process server timing; review and sign subpoenas; email M. Gilliam update re service of subpoenas; email M. Gilliam re service of B. Morris timing; email M. Gilliam re proposed email to union; conf. w/ B. Pryor and M. Gilliam re court's order re religious liberty training; email process server re cancellation of service	1.8	1.8	\$395.00	\$711.00
05/16/2023	Garcia, Cristina	Email process server re quote for subpoenas; conf. w/ M. Hill re same; revise subpoena re same; email M. Hill re same; assemble same; email process server re same	1.7	1.7	\$110.00	\$187.00
05/17/2023	Pryor, Bobby G.	Emails re opposing counsel request to file trial brief; teleconf w/M. Gilliam and M. Hill re show cause hearing and strategy for the same; conf w/D. Bruce re show cause hearing issues	1.8	1.8	\$495.00	\$891.00
05/17/2023	Bruce, Dana G.	Conf. w/B. Pryor re upcoming hearing, privilege issues, invoking rule, and potential claims and damages of Charlene Carter	NC (.80)	0	\$495.00	\$0.00
05/17/2023	Hill, Matthew D.	Email M. Gilliam re P. McKeeby's inquiry re leave to file brief; conf. w/ B. Pryor and M. Gilliam re sanctions hearing strategy; comment on proposed email to union re setting up call	0.9	0.9	\$395.00	\$355.50
05/18/2023	Pryor, Bobby G.	Review SW motion for leave to file trial brief; review SW brief re witness issues; review SW in camera document production; emails re the same; review Order re the same; confs w/D. Bruce re strategy for show cause hearing including exhibits to use, witnesses to call and order of witnesses	1	1	\$495.00	\$495.00
05/18/2023	Bruce, Dana G.	Review briefs and conf. w/B. Pryor re strategy for hearing	NC (.40)	0	\$495.00	\$0.00
05/18/2023	Hill, Matthew D.	Identify and email paralegal re documents to be included in hearing notebook; conf. w/ M. Gilliam in preparation for call w/ union; conf. call w/ E. Cloutman and A. Greenfield re communications w/ Southwest about notices; follow-up call w/ M. Gilliam re same; conf. w/ M. Gilliam re Southwest's brief in response to court order; email exchange w/ B. Pryor re same; review documents produced by Southwest after in camera inspection; email M. Gilliam re same	1.9	1.9	\$395.00	\$750.50
05/18/2023	Garcia, Cristina	Assemble hearing notebook for B. Pryor; email M. Hill re same	1.1	1.1	\$110.00	\$121.00
05/19/2023	Pryor, Bobby G.	Review and revise brief in response to SW brief re Court order; emails re same	0.4	0.4	\$495.00	\$198.00
05/19/2023	Hill, Matthew D.	Review and comment on response brief re show cause hearing; email B. Pryor re court's order re witnesses; review Southwest's response re religious liberty training	1.7	1.7	\$395.00	\$671.50
05/21/2023	Hill, Matthew D.	Conf. w/B. Pryor re witness examination strategy	0.1	0.1	\$395.00	\$39.50

05/22/2023	Hill, Matthew D.	Review communications produced by union; conf. w/ M. Gilliam re same; email B. Pryor re same; email documents to paralegal for inclusion in hearing notebook; review case re Southwest's argument on ultimate employment actions; conf. w/ M. Gilliam re arguments responding to Southwest's brief; review and comment on brief re religious liberty training; confs. w/ M. Gilliam re brief; prepare presentation of documents to be used at hearing	5.1	5.1	\$395.00	\$2,014.50
05/22/2023	Garcia, Cristina	Assemble hearing notebook for B. Pryor; email M. Hill re same	1.1	1.1	\$110.00	\$121.00
05/23/2023	Pryor, Bobby G.	Finalize preparation for show cause hearing including preparation of examination of all witnesses and review documents re the same; show cause hearing; confs w/client and M. Gilliam	7.8	7.8	\$495.00	\$3,861.00
05/23/2023	Pryor, Bobby G.	Travel to courthouse	NC (.70)	0	\$495.00	\$0.00
05/23/2023	Hill, Matthew D.	Additional preparation of document presentation for hearing; conf. w/ M. Gilliam in preparation for hearing; conf. w/ B. Pryor in preparation for hearing; attend show cause hearing	6.7	6.7	\$395.00	\$2,646.50
05/23/2023	Hill, Matthew D.	Travel to and from show cause hearing	NC (1.10)	0	\$395.00	\$0.00
05/24/2023	Pryor, Bobby G.	Emails re scheduling issues, order of witnesses and witness examination issues; teleconf w/M. Gilliam re the same; conf w/D. Bruce re show cause issues; prepare email memorandum to M. Gilliam re show cause issues; review file re the same	1.7	1.7	\$495.00	\$841.50
05/24/2023	Bruce, Dana G.	Conf. w/B. Pryor re strategy re continuation of hearing and further cross-examination of witnesses and arguments re violations by Southwest of Court's orders	NC (1.40)	0	\$495.00	\$0.00
05/25/2023	Pryor, Bobby G.	Teleconf. w/M. Gilliam re status, strategy and issues re motion for sanctions; conf w/D. Bruce re results of show cause hearing and issues to raise in closing and subsequent hearing	0.7	0.7	\$495.00	\$346.50
05/25/2023	Bruce, Dana G.	Conf. w/B. Pryor re strategy re closing statement and evidence and points of emphasis; email w/B. Pryor re closing and additional points	NC (.60)	0	\$495.00	\$0.00
05/30/2023	Hill, Matthew D.	Conf. w/ B. Pryor re strategy responding to A. Ryan re logistical issues; email M. Gilliam re same; conf. w/ M. Gilliam re same	0.3	0.3	\$395.00	\$118.50
06/04/2023	Hill, Matthew D.	Email paralegal re filing certificates of compliance; review transcript to confirm P. McKeeby exclusion under the Rule; email M. Gilliam and B. Pryor re same	0.4	0.3	\$395.00	\$118.50
06/05/2023	Pryor, Bobby G.	Emails and calls re re-scheduling show cause hearing and time limit proposals	0.1	0.1	\$495.00	\$49.50
06/06/2023	Pryor, Bobby G.	Emails re show cause hearing	0.1	0.1	\$495.00	\$49.50
06/06/2023	Hill, Matthew D.	Email M. Gilliam re hearing scheduling	0.1	0.1	\$395.00	\$39.50
07/03/2023	Hill, Matthew D.	Email M. Gilliam re inquiry from A. Ryan re exhibits	0.1	0.1	\$395.00	\$39.50
07/06/2023	Hill, Matthew D.	Call and emails to A. Ryan re conference on exhibits	0.1	0.1	\$395.00	\$39.50
07/07/2023	Hill, Matthew D.	Conf. w/M. Gilliam and A. Ryan re exhibit issues	0.2	0.2	\$395.00	\$79.00
07/10/2023	Hill, Matthew D.	Review exhibits sent by K. Frye to confirm completeness and accuracy; email M. Gilliam and B. Pryor re same; email paralegal re redacting Exhibit 16	0.5	0.5	\$395.00	\$197.50
07/11/2023	Hill, Matthew D.	Email A. Ryan re redacted Exhibit 16; email M. Gilliam re C. Carter's attendance at hearing	0.2	0.2	\$395.00	\$79.00
07/11/2023	Garcia, Cristina	Review and redact exhibit 16	0.1	0.1	\$110.00	\$11.00
07/13/2023	Hill, Matthew D.	Email paralegal re preparing hearing exhibits	0.1	0.1	\$395.00	\$39.50
07/14/2023	Pryor, Bobby G.	Review prior hearing transcript; outline the same; review prior hearing exhibits; emails re the same; review documents re request for documents to union counsel; emails re the same; review index of show cause hearing documents; emails re the same; teleconf. w/M. Gilliam re status and strategy	4	4	\$495.00	\$1,980.00
07/14/2023	Hill, Matthew D.	Conf. w/ M. Gilliam and B. Pryor re hearing strategy; email paralegal re documents to use at hearing	1.1	1.1	\$395.00	\$434.50
07/14/2023	Garcia, Cristina	Continue assembling additional exhibits for show cause hearing	0.6	0.6	\$110.00	\$66.00
07/17/2023	Pryor, Bobby G.	Review SWA Ex 1 and outline issues; emails re the same; review SWA Ex. 2 and outline the same; emails re the same; emails re trial exhibit 10; prepare for show cause hearing and review documents re the same	4.3	4.3	\$495.00	\$2,128.50
07/17/2023	Bruce, Dana G.	Strategy re cross-examination and failure to produce document and redo entire production	NC (.40)	0	\$495.00	\$0.00
07/17/2023	Hill, Matthew D.	Locate and email B. Pryor re former Southwest accommodation policy	0.2	0.2	\$395.00	\$79.00
07/18/2023	Pryor, Bobby G.	Review documents re preparation for examination of P. McKeeby; outline examination re the same; review pleading and prior motion practice and briefing related to show cause issues	6.1	6.1	\$495.00	\$3,019.50
07/18/2023	Bruce, Dana G.	Strategy conf. w/B. Pryor re examination of witnesses	NC (.50)	0	\$495.00	\$0.00
07/18/2023	Hill, Matthew D.	Email B. Pryor re witness for hearing	0.2	0.2	\$395.00	\$79.00
07/19/2023	Pryor, Bobby G.	Review documents re K. Minchey examination; outline examination of K. Minchey; review documents re K. Forbes examination; outline K. Forbes examination; review documents relating to emails not produced by SW; emails re the same; confs re the same; prepare for show cause hearing; teleconf w/M. Gilliam re status and strategy	8.2	8.2	\$495.00	\$4,059.00
07/19/2023	Garcia, Cristina	Continue assembling additional exhibits for show cause hearing	1.7	1.7	\$110.00	\$187.00
07/19/2023	Hill, Matthew D.	Conf. w/ B. Pryor re documents to use in examinations at hearing; prepare presentation for show-cause hearing	4.8	4.8	\$395.00	\$1,896.00
07/20/2023	Pryor, Bobby G.	Finalize preparation for show cause hearing; show cause hearing	6.8	6.8	\$495.00	\$3,366.00

07/20/2023	Hill, Matthew D.	Final work to prepare presentation for hearing; attend show-cause hearing; email K. Frye re additional exhibits used at hearing	8.1	8.1	\$395.00	\$3,199.50
07/20/2023	Garcia, Cristina	Conf. w/ M. Hill re exhibits; mark exhibits 17 and 18; email M. Hill re same	0.2	0.2	\$110.00	\$22.00
08/07/2023	Hill, Matthew D.	Review and analysis of contempt order	0.4	0.4	\$395.00	\$158.00
08/07/2023	Pryor, Bobby G.	Review and outline Memorandum Opinion and Order Granting sanctions; emails and teleconfs re the same; emails and calls re in camera documents, in camera testimony and ex parte addendum and issues re the same	2.2	2.2	\$495.00	\$1,089.00
08/09/2023	Hill, Matthew D.	Conf. w/ M. Gilliam re submissions re fees; email M. Gilliam re time records	0.3	0.3	\$395.00	\$118.50
08/15/2023	Hill, Matthew D.	Review and comment on motion for fees, bill of costs, and draft declarations in support; email M. Gilliam re same and answers to strategy questions re same; email paralegal re instructions for preparing exhibit to B. Pryor Declaration re fees	2.4	2.4	\$395.00	\$948.00
08/17/2023	Hill, Matthew D.	Follow-up email exchange with M. Gilliam re motion for fees; emails w/ paralegal re preparation of exhibit to B. Pryor declaration	0.4	0.4	\$395.00	\$158.00
08/18/2023	Hill, Matthew D.	Perform calculations on and revise Exhibit 2 to Pryor declaration re fees; revise expenses exhibit re same to exclude expenses unrelated to contempt issue; revise Pryor declaration; conf. w/ M. Gilliam re fee motion	2.1	2.1	\$395.00	\$829.50
Totals:			135.7	131.7		\$56,628.00

EXHIBIT 3

Description	Quantity	Amount	Total	Detailed Description
January				
Pacer			\$3.00	Download documents re sanctions proceedings
May				
Parking			\$40.00	Courthouse parking for M. Hill and B. Pryor
Pacer			\$7.50	Download documents related to sanctions proceedings
Litigation Express			\$40.00	Administrative fee for preparation to serve unissued subpoenas
Mileage	21	\$0.29	\$6.09	Travel to and from courthouse for M. Hill and B. Pryor
July				
Mileage	21	\$0.29	\$6.09	Travel to and from courthouse for M. Hill and B. Pryor
Parking			\$38.00	Courthouse parking for M. Hill and B. Pryor
Total			\$140.68	